

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA )  
 ) No. 3:16-cr-00102  
 v. )  
 ) Judge Trauger  
MICHAEL POTEETE )

**GOVERNMENT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE**

The United States of America, by and through Donald Q. Cochran, United States Attorney for the Middle District of Tennessee, and the undersigned counsel, hereby respectfully requests a second extension of time to file a Response to the Defendant's Motion for Compassionate Release (DE#50). The United States is respectfully requesting a one-day extension and would therefore ask for a due date of Friday, June 5, 2020 to file the Response.

1. The Court has ordered the United States to respond by today on the merits.
2. The undersigned has been working on a Response, which necessitates review of voluminous medical records. Over 500 pages of medical records have been produced by the defense. The defense references “liver damage” and a “current problem with his splenic artery” as “extraordinary and compelling reasons” warranting compassionate release; and defense cites in footnotes 3 and 4 of the defense motion specific page numbers in the medical records for reference. (DE#50, PageID#151, 155). The undersigned is requesting an additional day to review the medical records pertaining to the third condition cited – “a history of heart problems” – and finalize the Response. (*Id.*)

3. Undersigned is obviously working to get the Response filed forthwith; however, undersigned is balancing this Response with a heavy caseload, including handling a three-hour detention and preliminary hearing yesterday afternoon and a sentencing hearing later today.

4. There is an event scheduled for downtown Nashville later this afternoon; and the undersigned is attempting, if possible, to leave the office no later than 4pm today.

5. The undersigned communicated with defense counsel who is opposed to an extension.

Thus, for the reasons listed above, the United States would respectfully request a one-day extension to June 5, 2020 to file a Response.

Respectfully submitted,

DONALD Q. COCHRAN  
United States Attorney for the  
Middle District of Tennessee

s/ Joseph P. Montminy  
Joseph P. Montminy  
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**Certificate of Service**

The undersigned hereby certifies that on June 4, 2020, a true and exact copy of the foregoing document has been served through the electronic case filing system upon defense counsel, Michael C. Holley:

*s/ Joseph P. Montminy*  
Joseph P. Montminy  
Assistant United States Attorney